## TRAVIS A. GAGNIER

ATTORNEY AT LAW

33507 NINTH AVENUE SOUTH, BLDG. F FEDERAL WAY, WA 98003

253-941-0234 (Main) www.bestbk.com

SEATTLE OFFICE 1420 Fifth Avevue, Suite 2200 Seattle, WA 98101 206-622-0123

June 21, 2023

SOUTHCENTER OFFICE 14900 Interurban Avenue S., Suite 271 Seattle, WA 98168 253-852-8114

Case #: 23-10374

Re: Stephen & Patricia Miller

## Fees

01/23/2023 TAG	Initial meeting with clients re: foreclosure, filing Chapter 13, options,	Rate	Hours	
	research prior case that was dismissed in the last year. Discussion re: same w/ clients.	450.00	0.75	337.50
02/15/2023 JR JR JR	Intake meeting with client, going over paperwork, assisting with questions on forms and of clients. Lots of questions, nervous. Begin preparation of petition, plan and schedules. Prepared list for client of documents and information we still need from them, deadline for same and instructions on how to get the	200.00 200.00	1.20 0.40	240.00 80.00
JR	information to us.  Prepared draft of motion extend stay, declaration therefore. Work	200.00	0.25	50.00
TAG	on filing. Notes to atty.	200.00	0.80	160.00
IAC	re: same.	450.00	0.40	180.00
02/22/2023 JR	Work on intake, paperwork. Call with client going over every email and documents.	200.00	0.30	60.00
02/23/2023 TAG	Work on plan, schedules and draft of plan/pmts for review w/ clients. Due to foreclosure, we will file the case on emergency basis.	450.00	0.35	157.50
02/27/2023 JR TAG	· · · · · · · · · · · · · · · · · · ·	200.00	0.30	60.00
	questions. Notes to para re: e-filing stopping foreclosure. Clients very nervous on foreclosure, re-file.	450.00	0.40	180.00
02/28/2023 JR JR	Work on case, emergency filing, revised/finalized same. Researched upcoming foreclosure. Notified Quality Loan of filed	200.00	0.60	120.00
JR	bankruptcy, called them re: same to stop foreclosure. Prepared letter to client re: filing case and approximate plan payment amount. Informed client again that we are still needing: 1. Bank of America history for your account ending 7729 for the time period of February 4, 2023 through March 1, 2023	200.00	0.70	140.00
TAG	<ul> <li>2. Original 2021 tax returns, signed in blue ink.</li> <li>3. Signed copy of your 2022 tax returns once prepared.</li> <li>Review and sign initial letters/instructions to clients RE: payments,</li> </ul>	200.00	0.25	50.00
JR	court dates. Check status regarding stopping foreclosure.	450.00	0.25	112.50
JK	instructions.	200.00		0.00

Stephen & Patricia Miller Account No. 3051.00		Statement Date: 06/21/2023 Statement No. 27911 Page No. 2			
	ID	Made as making as aken askanaing Durangan duration and ask	Rate	Hours	
	JR	Work on motion re: stay extension. Prepared motion, order to shorten time due to judge selection, calendars.	200.00	0.50	100.00
	TAG	Work on motion to shorten time, motion re: stay extension.	450.00	0.25	112.50
		,			
03/01/2023	JR	Review signed order shortening hearing time. Prepared notice of hearing .	200.00	0.30	60.00
03/06/2023	JR	Work on trustee information sheet, assembling same for review by attorney prior to upload to trustee. Noted items of interest for TAG			
		to review.	200.00	0.35	70.00
03/13/2023	JR	Contacted Kenny Whiteside 425-947-2614 the realtor. Need			
		information to send him and get the listing agreement.	200.00	0.20	40.00
	JR	Telephone call with Kenny at Redfin. He was confused. Email to clients.	200.00	0.20	40.00
	JR	Continued work on schedules, plan and statements for filing of the	200.00	0.20	40.00
		balance of same with court by the deadline. Work w/ CB re: taking			
	0.0	over on completion for this one.	200.00	0.40	80.00
	СВ	Continued work with clients on schedules, plan and statements for review meeting with atty tomorrow.	200.00	1.00	200.00
	TAG	Work on schedules, plan, budget for review w/ clients tomorrow.	450.00	0.40	180.00
03/14/2023	JR	Review of docket for responses. Docketed Declaration of No Objections with the court. Reviewed final order, lodged for entry -			
		order re: extending stay	200.00	0.10	20.00
	JR	Telephone call with client re: realtor coming over tomorrow and			
		again explaining he does not need to set people to look at his		0.40	00.00
	TAG	house, his realtor will do the work.  Review meeting w/ clients re: plans, schedules and budget.	200.00	0.10	20.00
	170	Discussed again re: listing house, etc.	450.00	0.40	180.00
03/15/2023	JR	Telephone calls with clients re:			
		1. Bank of America history for your account ending 7729 for the time period of February 4, 2023 through March 1, 2023			
		2. Original 2021 tax returns, signed in blue ink.			
		3. Signed copy of your 2022 tax returns	200.00	0.20	40.00
	TAG	Revisions to budget, schedules per review yesterday. Notes to para	450.00	0.05	457.50
	СВ	re: finalizing. Work on case to finalize plan, schedules following review with atty.	450.00	0.35	157.50
	OB	Instructions to JR re: completion letter details.	200.00	0.50	100.00
	TAG	Review and approve TIS	450.00	0.25	112.50
	JR	Prepare completion letter and send to client with final plan payment	200.00	0.05	F0 00
	JR	amount, and terms of plan.  Prepare and file declaration of mailing. Mail notice to all creditors	200.00	0.25	50.00
	0.1	on the mailing matrix.	200.00		0.00
	TAG	Review of completion notes. Review/sign initial letters/instructions			
		to clients re: payments, court dates and follow-up items.	450.00	0.10	45.00
03/21/2023	TAG	Work on listing issues, emails w/ agent and clients re: getting listed			
		sooner rather than later.	450.00	0.40	180.00

Stephen & Patricia Miller Account No. 3051.00		Statement Date: 06/21/2023 Statement No. 27911 Page No. 3			
	GJ	Review listing Agreement; review file; draft Motion and Declaration for Order employing real estate broker; draft Order re same; email realtor with instructions.	Rate 450.00	Hours 0.60	270.00
03/22/2023	JR	Review IRS proof of claim. Sent signed 2021 & 2022 copies to the IRS to amend the claim.	200.00	0.20	40.00
03/23/2023	JR GJ	Review amended IRS proof of claim. All taxes show filed. Respond to client questions re: amended claim. Review file; review trustee website; prepare 341 Report.	200.00 450.00	0.20 0.40	40.00 180.00
03/27/2023	GJ	Review executed real estate broker Declaration; finalize pleadings; email 13 office requesting sign off on Order re Employment of Broker	450.00	0.25	112.50
03/28/2023	TAG	Meeting with client(s) re: upcoming hearing, questions and issues. Review of 341 report, file and issues prior to meeting. Notes to file, staff re: file prep and f/u items.	450.00	0.30	135.00
03/30/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: Portfolio Recovery	450.00	0.10	45.00
03/31/2023	СВ	Work on case, prep and documents for 341 meeting. Follow up on TIS documents to trustee.	200.00	0.20	40.00
04/01/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: Ally Bank- 2 claims	450.00	0.10	45.00
04/03/2023 TAG TAG	Appear and represent clients at 341 meeting of creditors. Two cases heard on docket plus one continuance.  Notes to file re: 341 meeting, next steps for confirmation. Emails w/	450.00	0.25	112.50	
		clients re: listing house, timeline and alternate plan of theirs to have a family member refinance the mortgages.	450.00	450.00 0.30	135.00
04/04/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: Portfolio Recovery	450.00	0.10	45.00
04/05/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: Portfolio Recovery- 2 claims	450.00	0.10	45.00
	JR	objection to confirmation.	200.00	0.50	100.00
	TAG Work on confirmation issues. Review, revise respect to confirmation by Nationstar.	Work on confirmation issues. Review, revise response to objection to confirmation by Nationstar.	450.00	0.25	112.50
04/21/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: Portfolio Recovery 4th claim.	450.00	0.10	45.00

Stephen & Patricia Miller Account No. 3051.00		Statement Date: Statement No. Page No.	27911		
			Rate	Hours	
04/24/2023	TAG	Review of PSA sent by clients. Called them re: same to discuss if they want to go ahead.	450.00	0.30	135.00
04/25/2023	JR TAG	Review amended IRS proof of claim. All taxes show filed now. Continued efforts to contact clients re: sale of the property,	200.00	0.10	20.00
		questions.	450.00	0.20	90.00
04/26/2023 TAG GJ	TAG GJ	Meeting w/ client re: case, paying off w/ recent investor offer, they want to go ahead against legal advise and sell/payoff. Notes to para and GJ re: getting it approved by the court.  Review proof of claim for possible objection as incorrectly filed as	450.00	0.50	225.00
		secured, unsecured or priority, review for allowability of same re: Part Tree Investments- secured	450.00	0.10	45.00
04/27/2023 GJ	GJ	Review file; review Purchase & Sale Agreement; review trustee website; draft Notice of Hearing draft Motion to Sell Real Property and Declaration of Mailing; draft Proposed Order re same; draft client's Declaration in Support of Motion;  Work on declaration re: sale, conference w/ GJ re: same. Emails w/ client re: dec and sale progress.	450.00	0.60	270.00
	TAG		450.00	0.30	135.00
04/28/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re:  Verizon	450.00	0.10	45.00
05/04/2022	TAC		400.00	0.10	40.00
05/01/2023	TAG	Continued work on confirmation issues, continued everything to 6/7 re: confirmation to match MRFS and sale motion.	450.00	0.25	112.50
05/04/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: US Bank- secured	450.00	0.10	45.00
05/08/2023	GJ	Review proof of claim for possible objection as incorrectly filed as secured, unsecured or priority, review for allowability of same re: King County Treas- secured	450.00	0.10	45.00
05/10/2023	GJ	Review file. Evaluate feasibility of plan after passage of bar date; prepare feasibility report.	450.00	0.20	90.00
05/11/2023	TAG	Review of feasibility report from GJ. Notes to para on case re: same, f/u items.	450.00		0.00
05/26/2023	JR	Work on case issues, foreclosure. Prepared response to US			
	TAG	Bank's MFRS. Review, finalize response to MRFS.	200.00 450.00	0.50 0.25	100.00 112.50
05/30/2023	TAG	Work on issues w/ sale, continued work on trying to get estimated closing statement for trustee/court where there is no real estate agent involved.	450.00	0.40	180.00
05/31/2023	JR	Review fourth amended IRS proof of claim. All taxes filed	200.00	0.10	20.00
		·			

Stephen & Patricia Miller Account No. 3051.00		Statement Date Statement No Page No	. 279			
	GJ	Review Settlement Statement; draft Supplemental Declaration in	Rate	Hours		
		Support of Sale	450.00	0.25	112.50	
06/01/2023	TAG	Work on issues with sale, getting closing statement, working w/ clients and Ticor re: same, declaration re: estimated statement and other issues. Getting sale over the finish line to pay off secured creditors, resolve MRFS and pay off the case.	450.00	1.25	562.50	
06/06/2023	SH	Prepared letter to client re: case being confirmed, next steps and advised client to get financial management course completed.	145.00		0.00	
06/08/2023	SH	LVM re: Trustee has been trying to send routine correspondence and it came back as undeliverable. We need client's updated address so we can update the file/court/trustee.	145.00		0.00	
			140.00		0.00	
06/13/2023	SH SH	LVM re: Trustee has been trying to send routine correspondence and it came back as undeliverable. We need client's updated address so we can update the file/court/trustee.  Sent email to Client re: LVM re: Trustee has been trying to send routine correspondence and it came back as undeliverable. We	145.00		0.00	
		need client's updated address so we can update the file/court/trustee.	145.00		0.00	
06/20/2023	СВ	Prepare fee itemization from beginning of case to date. Forward Motion to TAG for review.	200.00	0.90	180.00	
06/21/2023	TAG	Review Motion for Original Approval of Professional Fees. Finalize and return to CB for filing w/ the court.	450.00	0.40	180.00	
		For Current Services Rendered		24.05	7,922.50	
		Recapitulation				
		Title         Hours         Rate           Senior Attorney -TAG         9.25         \$450.00           Of Counsel - GJ         3.20         450.00           Sr. Paralegal         11.60         200.00	Total \$4,162.50 1,440.00 2,320.00			
<u>Expenses</u>						
03/01/2023 03/01/2023 03/15/2023 03/15/2023 06/21/2023 06/21/2023		Postage re: full ntc mailings - Motion Extend Stay - 32 units. Copies re: full ntc mailings - Motion Extend Stay - 32 units. Postage re: full ntc mailings - Chapter 13 Plan and 341 Court Notice - Copies re: full ntc mailings - Chapter 13 Plan and 341 Court Notice - Copies re: full ntc mailings - Motion for Attorney Fees and Costs - 42 Postage re: full ntc mailings - Motion for Attorney Fees and Costs - 42	33 units. units.		20.16 12.80 20.79 13.20 12.60 26.46	
		Total Expenses			106.01	
		Total Current Work			8,028.51	
		Balance Due			\$8,028.51	